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6 Attorneys for Defendant
7 CITY OF LOS ANGELES

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
10

11 JONATHAN PELTZ and KATHLEEN
12 GALLAGHER,

13 Plaintiffs,

14 v.

15 CITY OF LOS ANGELES, a municipal
16 entity; CHIEF MICHEL MOORE, a
public entity, and DOES 1 through 10,
inclusive,

17 Defendants.
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Case No. 2:22-CV-03106-HDV(AGR_x)

**DEFENDANT'S PROPOSED VOIR
DIRE QUESTIONS**

Final Pre-Trial Conference:

Date: April 29, 2025
Time: 10:00 a.m.
Dept.: 5B

1 TO THIS HONORABLE COURT AND TO PLAINTIFFS AND THEIR
2 ATTORNEYS OF RECORD:

3 Defendant hereby submits the following proposed voir dire questions.
4

5 1. If you believe someone is injured, are you willing to decide that the
6 person receive no compensation for the injury if you determine that the person or
7 entity accused of causing the injury did not do anything wrong?
8

9 2. Do you think that because the plaintiffs have made it this far in the
10 process that means there is merit to their case?
11

12 3. Have you ever participated in a protest relating to any incident
13 involving the police?
14

14 a. Which ones?

15 b. When?
16

17 4. Are you aware of news reports of verdicts or settlements involving
18 LAPD officers or the City of Los Angeles?

19 a. If so, are you willing to decide this case based on the evidence
20 presented to you in this trial or do you think that the other cases you are aware
21 of will interfere with your judgment?
22

23 5. Are you aware of news reports relating to law enforcement officers
24 taking action in connection with a protest?

25 a. If so, are you willing to decide this case based on the evidence
26 presented to you in this trial or do you think that the other cases you are aware
27 of will interfere with your judgment?
28

1 6. Have you or anyone in your immediate family ever made a claim
2 against the City of Los Angeles or an LAPD officer?

3 a. If so, please describe the circumstances.
4

5 7. Have you or anyone in your immediate family ever accused an LAPD
6 officer of committing misconduct?

7 a. If so, please describe the circumstances.
8

9 8. If you hear a report in the news or from someone else about a time that
10 a police officer took action against a person, before you hear the particulars of the
11 incident, do you find yourself believing that the police officer's actions were
12 appropriate or inappropriate?
13

14 Dated: April 17, 2025

BURKE, WILLIAMS & SORENSEN, LLP

17 By: /s/ Brian S. Ginter

18 Charles E. Slyngstad

19 Brian S. Ginter

20 Kyle Anne Piasecki

Attorneys for Defendant

CITY OF LOS ANGELES
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